

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER CHARLES BAKER,

Defendant.

Criminal No. 23-CR-31-J

**UNITED STATES' MOTION FOR PROTECTIVE ORDER AS TO *JENCKS ACT*
MATERIAL AND OTHER WITNESS STATEMENTS**

The United States, by and through Kerry J. Jacobson, Assistant United States Attorney for the District of Wyoming, has provided notice of its disclosure to the Defendant's counsel, (Doc. No. 89) and respectfully requests an order prohibiting the Defendant's counsel from photocopying or disseminating any of the materials being disclosed, including counsel's notes or any other version of reproduction, including electronic dissemination, of the information contained in the materials produced by the United States to any person, including the Defendant, without written permission of the Court, and that counsel for Defendant shall safeguard the materials and shall promptly delete all electronic versions of the reports and return all hard copies to Assistant United States Attorney Kerry J. Jacobson, forthwith at the conclusion of the trial in this matter. In support of said motion the United States hereby states and alleges the following:

1. Disclosure of this material prior to trial limits unnecessary interruptions during the trial;
2. Disclosure of this material prior to trial allows defense counsel to be prepared for cross-examination of the witness; and

3. The non-disclosure by defense counsel of the material will protect the witness or others mentioned in the material and prohibit interference with ongoing investigations and/or the obstruction of justice.

WHEREFORE, the United States prays as follows:

That the Court order defense counsel not to photocopy and/or disseminate in any way, including electronic versions, any of the material produced by the United States to any person, including the Defendant, without written permission from the Court, and that counsel for Defendant shall safeguard the materials and shall promptly delete any electronic version of the materials and return all hard copies to Assistant United States Attorney, Kerry J. Jacobson forthwith at the conclusion of the trial in this matter..

DATED this 5th day of October, 2023.

NICHOLAS VASSALLO
United States Attorney

By: /s/ Kerry J. Jacobson
KERRY J. JACOBSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of October, 2023, the foregoing was electronically filed and consequently served on defense counsel.

/s/ Elizabeth Kilmer
For the United States Attorney's Office